

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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|--------------------------|---|--------------------|
| UNITED STATES OF AMERICA | : | <u>STIPULATION</u> |
| - v. - | : | 2012-MJ-6655 (JAD) |
| DANNY SIAG, | : | 12-1604 M |
| Defendant. | : | |

X

IT IS HEREBY STIPULATED AND AGREED by and among the United States of America, by and through its counsel of record, the United States Attorney's Office for the Central District of California and Assistant United States Attorney Peter W. Baldwin, and defendant DANNY SIAG ("defendant"), by and through his counsel of record, Tony Mirvis, hereby agree and stipulate as follows:

1. Defendant was arrested in the District of New Jersey on or about July 2, 2012 in connection with a criminal complaint filed in the Central District of California (Case No.12-1604 M). Defendant made his initial appearance in the District of New Jersey on that same date, and the Honorable Joseph A. Dickson ordered that defendant be released upon the posting of a \$50,000 appearance bond signed by defendant's wife. In addition, it was ordered that defendant was to be subject to pre-trial supervision by the United States Pre-Trial Services Office.

2. One of the conditions of defendant's pre-trial release is that his travel is restricted to the Central District of California and the District of New Jersey, unless otherwise approved by Pre-Trial Services.

3. Defendant has yet to make his initial appearance in the Central District of California – although it was previously anticipated that defendant would do so on or about April 9, 2013. Defendant has been being supervised by Pre-Trial Services in the Central District of California.

4. On or about April 3, 2013, defendant's father passed away in Haifa, Israel.

5. The parties agree that the terms of defendant's bond and pre-trial release should be modified to allow defendant to travel to Israel for his father's funeral, subject to the following terms and conditions:

a. Defendant will return to the Central District of California within 10 days of his departure for Israel.

b. Prior to defendant's departure for Israel, defendant will provide to the government a copy of his travel itinerary, as well as the contact information (including name, address, and telephone number) for the family member with whom he will be staying while in Israel.

c. While in Israel, defendant will contact via telephone at least one time each day an Israeli law enforcement agent as instructed by the government. The government will provide defendant with the contact information for the law enforcement agent in advance of defendant's departure for Israel.

d. Defendant's wife and children will remain in the Central District of California during the entirety of his trip to Israel.

6. Prior to the filing of this Stipulation, counsel for defendant spoke with defendant's Pre-Trial Services Officer in the Central District of California Damion Davis. Officer Davis had no objection to the proposed modification of defendant's bond. However, he stated that a Court order from New Jersey would be needed in order to allow defendant to travel outside of the United States.

7. All other terms and conditions of defendant's bond and pre-trial release will remain in effect.

IT IS SO STIPULATED.

Dated: Brooklyn, NY
April 5, 2013

ANDRE BIROTE JR.
United States Attorney
Central District of California

By:


Peter W. Baldwin
Assistant United States Attorney

By:


Tony Mirvis, Esq.
Kiana Sloan-Hillier, Esq.
Attorney for Danny Siag